

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned counsel hereby appear in the above-captioned case for and on behalf of Robert W. Giacomini, as Trustee of the Giacomini Trust dated August 12, 1999, Jeanette E. Giacomini, as Trustee of the Jeanette E. Giacomini Revocable Intervivos Trust dated October 16, 2002, David A. Giacomini, as Trustee of the David A. Giacomini Trust of 2001 U.D.T. dated May 31, 2001, Robert W. Giacomini as Trustee of the Robert W. Giacomini Gst Exempt Trust, Jeanette E. Giacomini as Trustee of the Jeanette E. Giacomini GST Exempt Trust, David A. Giacomini as Trustee of the David A. Giacomini GST Exempt Trust, Ronald Giacomini, Richard Giacomini, and Lisa A. Martinoni (collectively, the “Giacomini Parties”), for all purposes in connection with this case. The undersigned counsel hereby request service of any and all notices given or required to be given in the above-captioned case, and all papers served or required to be served in the case, and request that the names and addresses of the undersigned counsel be added to all mailing matrices in this case. Service may be made and directed as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and the Bankruptcy Code, but also includes without limitation any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, email, electronic filing or otherwise filed or made with regard to the above-captioned case and proceedings therein, and for the purposes of CM/ECF.

This Notice of Appearance and Request for Service of Papers is without prejudice to the Giacomini Parties' rights, remedies, and claims against other entities or any objection that may be had to the subject-matter jurisdiction of the court, and shall not be deemed or construed to submit the Giacomini Parties to the jurisdiction of the Court. All rights, remedies, and claims are hereby expressly reserved, including without limitation, the Giacomini Parties' (i) right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) right to trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) right to seek a change of venue, or (v) any other rights, claims, actions, setoffs or recoupments to which the Giacomini Parties are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Giacomini Parties expressly reserve.

Dated: March 3, 2025

CROSS & SIMON, LLC

/s/ Kevin S. Mann

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